

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LUIS ANGEL RODRIGUEZ)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No.: 1:19-cv-10116-LTS
)	
BOSTON PUBLIC SCHOOLS and SHAUN O.)	
HARRISON, individually and in his official)	
Capacity,)	
<i>Defendants.</i>)	

PLAINTIFF'S STATUS REPORT

Pursuant to the Court's request, Counsel for the Plaintiff provide the following Status Report regarding its intention to request default judgment pursuant to Fed. R. Civ. P. 55(b)(2) against the Defendant, Shaun O. Harrison.

1. On February 25, 2022, this Court granted Defendant Boston Public Schools' Motion for Summary Judgment. In its order granting the motion, this Court ordered the Plaintiff to file a status report explaining how he wishes to proceed as to his claims against the remaining Defendant, Shaun O. Harrison, in his individual capacity. See ECF No. 61.
2. Although a default has entered against Harrison (see ECF No. 30), the Plaintiff has not yet obtained judgment against Harrison.
3. The Plaintiff, by and through counsel, intends to file an application for default judgment against Harrison pursuant to Fed. R. Civ. P. 55(b)(2) and a Motion for Assessment of Damages.
4. However, the Plaintiff is currently undergoing intensive inpatient psychiatric treatment, which will require approximately thirty (30) days to complete.
5. In order for the Plaintiff to participate meaningfully in the prosecution of his case, which is his desire, without interfering with his care for acute conditions, the Plaintiff requests leave of

Court to file and serve an Application for Default Judgment and Assessment of damages within three weeks after his discharge, no later than April 28, 2022.

WHEREFORE, the Plaintiff respectfully requests leave of Court to file and serve an Application for Default Judgment and Assessment of Damages on or before April 28, 2022.

Respectfully submitted,
By Plaintiff's attorneys,

/s/ John T. Martin

John T. Martin; BBO #676344

jmartin@kjclawfirm.com

Michaela M. Weaver, BBO # 705985

mweaver@kjclawfirm.com

Thomas G. Wood; BBO #707877

twood@kjclawfirm.com

KJC Law Firm, LLC

1 Exchange Street, 2nd Level

Worcester, MA 01608

(617) 720-8447

Date: March 8, 2022

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2022, a copy of the foregoing was served electronically via the CM/ECF system upon all counsel of record for the Defendant and all registered participants, as identified on the Notice of Electronic Filing (NEF) System.

/s/ John T. Martin